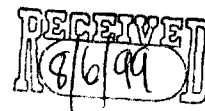




August 3, 1999

Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, SW (HFS-450)
Washington, DC 20204



RE: Ricola® Herbal Health™ Antioxidant Formula

To Whom It May Concern:

Pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994 ("DSHEA"), Ricola, Inc. ("Ricola"), Morris Plains, New Jersey 07950, hereby notifies the Food and Drug Administration that within the past 30 days the Company has begun marketing a dietary supplement with a label that bears statements of nutritional support. Ricola is the distributor of this product.

The dietary supplement for which the statements are made is Ricola® Herbal Health™ Antioxidant Formula. Per serving size of two tablets, the supplement contains: Green tea leaf standardized extract, 250 mg; Mixed bioflavonoids, 100 mg; BioVin® whole grape standardized extract, 50 mg; Tumeric rhizome standardized extract, 50 mg; Bio-enhancing herbal blend, 25 mg (extracts of hyssop, lemon balm leaf, peppermint leaf, sage leaf and thyme leaf); Vitamin A, 10,000 IU; Vitamin C, 500 mg; Vitamin E, 100 IU; and Selenium, 100 mcg.

The statements of nutritional support for this product read as follows:

- Scientific studies on antioxidants have shown that these special nutrients found in foods can help in the fight against premature aging and cell damage.
- Ricola® Herbal Health™ Antioxidant Formula is a comprehensive, vitamin-enriched combination of highly standardized concentrates of protective foods, including green tea and whole red grape.
- With advanced levels of every known antioxidant nutrient, Antioxidant Formula is further enhanced with a special blend of healthful Ricola herbs.

A copy of the outer package and inner-container label for the product is attached.

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These statements are accompanied by the required disclaimer indicating that the statements have not been evaluated by FDA and that the product is not intended to diagnose, treat, cure or prevent any disease.

Ricola certifies that it possesses adequate substantiation for these statements of nutritional support; that the substantiation renders them truthful and non-misleading and thus permissible under the DSHEA; and that the information contained in this notice is complete and accurate.

Sincerely,

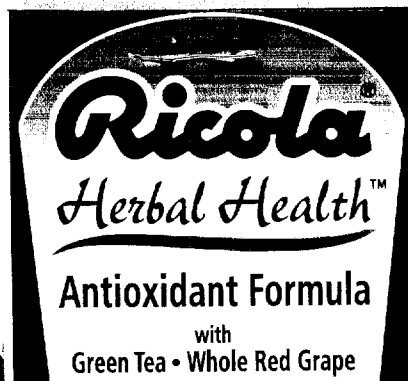
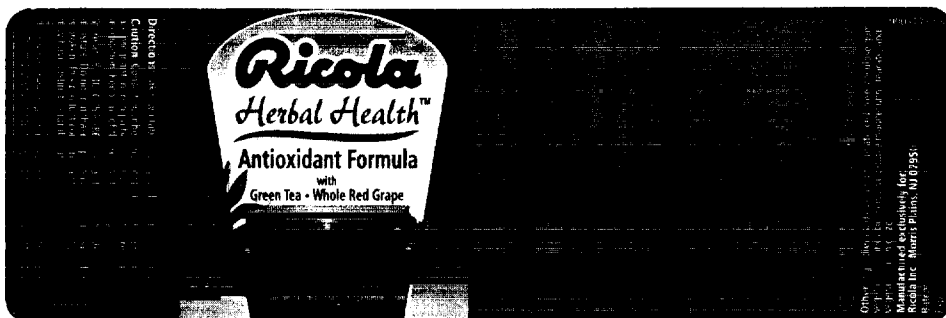
A handwritten signature in black ink, appearing to read "Dan Thomas", written over a horizontal line.

Dan Thomas
President

Enclosure

Original plus two copies enclosed

Ricola® Herbal Health™ Antioxidant Formula



For more than sixty years the world has trusted the Ricola name for herbal products of the highest quality and purity. Today, the tradition continues with Ricola® Herbal Health™ supplements. Meticulously crafted by Swiss experts, these balanced formulas skillfully combine research-recommended levels of highly standardized botanicals with essential vitamins and minerals. Each formula is further enhanced for optimum digestibility with an exclusive blend of healthful Ricola herbs.

Ricola® Herbal Health™ dietary supplements also available:

- Active Memory Formula
- Heart Formula
- Immune Formula
- Prostate Formula
- Women's Formula
- Mood Formula
- Night Time Formula

Directions: Take two tablets daily, preferably with a meal.

Caution: Consult your health professional before using if you are pregnant, nursing a baby, or are taking any prescription medication. Keep out of the reach of children.

Store at 15–30°C (59–86°F) away from heat, light and moisture. Do not purchase if printed neckband seal of bottle is broken. This product contains herbal ingredients, which may have distinct natural odors.

Scientific studies on antioxidants have shown that these special nutrients found in foods can help in the fight against premature aging and cell damage. Ricola® Herbal Health™ Antioxidant Formula is a comprehensive, vitamin-enriched combination of highly standardized concentrates of protective foods, including green tea and whole red grape. With advanced levels of every known antioxidant nutrient, Antioxidant Formula is further enhanced with a special blend of healthful Ricola herbs.

For comments or questions on Ricola herbal supplements, call 1-800-323-9073, or visit us at www.ricolausa.com.

Other ingredients: dicalcium phosphate, cellulose, cellulose gum, vegetable stearic acid, silica, vegetable magnesium stearate, and vegetable resin glaze.

Exclusively manufactured for:
Ricola Inc., Morris Plains, NJ 07950

